

# AHMAD KESHAVARZ

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December 13, 2018

**VIA ECF**

Hon. Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: Letter for pre-motion conference to seal Exhibit C, DE 92-3 to Plaintiff's  
December 13, 2018 Letter for pre-motion conference to enforce October 16,  
2018 order or, in alternative, to compel [DE 92].  
*Hunter v. Palisades Acquisition XVI, LLC, et al, Case No. 1:16-cv-08779-ER***

Dear Judge Ramos:

The undersigned represents Plaintiff in this Fair Debt Collection Practices Act and General Business Law case.

On December 13, 2018, Plaintiff filed Plaintiff's request for pre-motion conference to enforce October 16, 2018 order or, in alternative, to compel [DE 92]. Unfortunately, Exhibit C was filed in error.

Initially Defendants designated almost all of their document production confidential. However, pursuant to para 11.3(b) of the agreed protective order [DE 54] the designations were subsequently withdrawn for almost all of the documents. The single page for which the confidentiality designation has not yet been withdrawn was the document that was inadvertently filed as Exhibit C (Document 92-3 Page 1 of 27).<sup>1</sup>

Plaintiff therefore seeks to seal that single page of Exhibit C (Document 92-3 Page 1 of 27) of Plaintiff's request for pre-motion conference to enforce October 16, 2018 order or, in alternative, to compel [DE 92].

We apologize for the error.

Respectfully submitted,

/s/

Ahmad Keshavarz

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<sup>1</sup> While Plaintiff does not believe that the first page of Exhibit C in fact meets the Second Circuit standard for confidentiality, for purposes of efficiency Plaintiff chooses not to challenge Palisades' designation at this time.

cc: Opposing counsel via ECF